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August 8, 2023

Via E-File

Hon. Cathy L. Waldor, U.S.M.J
Martin Luther King Bldg & US Courthouse
50 Walnut Street
Newark, New Jersey 07102

RE: E.S. v. Essex County, et al.
Civil Action No.: 2:21-cv-08512

Dear Judge Waldor:

Please be advised that the undersigned represents the plaintiff, E.S., in regard to the above-captioned matter.

There have been numerous delays and obstacles in attempting to get any discovery from the defendant, County of Essex, in this matter. As a consequence of the same, at the last status conference, the Court entered a Scheduling Order requiring that Essex County provide the discovery requested by August 4, 2023.

The undersigned has received absolutely no communication from Mr. Ruddy regarding the same. Once again, the Discovery Order has been ignored.

There is a telephonic conference scheduled on September 11, 2023 at 11:30 a.m. Please accept this correspondence as notice that the plaintiff will be seeking leave from the Court to file the appropriate discovery motion.

It also should be noted that I withheld seeking any discovery from the federal government which will have to be done through motion in anticipation of receiving discovery from the County of Essex in a timely matter, which has not occurred.

Thank you for your cooperation in this matter.

Respectfully submitted,

FAUGNO & ASSOCIATES, L.L.C.

/s/ Paul Faugno

Paul Faugno, Esq.

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cc: Alan Ruddy, Esq.